



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

July 11, 2022

**By ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

**MEMO ENDORSED**

Re: *Melody Business Finance, LLC v. Falcone, et al.*, No. 22-CV-1698 (KPF)

Dear Judge Failla:

This Office represents the United States of America (the “Government”) in the above-captioned action. We write respectfully to request a four-day extension from today, until July 15, 2022, for the parties to submit their proposed discovery protocols.

Paragraph 7 of the Civil Case Management Plan and Scheduling Order (Dkt. 20), requires the parties to file any agreements concerning discovery by today. Because this case involves taxpayer information, in addition to an electronically stored information protocol, the parties need to consider a proposed protective order to the Court before finalizing and filing our discovery agreements.

This is the Government’s first request for an extension of this deadline. Plaintiff consents to this request. As stated during the initial pretrial conference held telephonically on June 9, 2022, the remaining Defendants (Philip A. Falcone, Lisa M. Falcone, and Three-Hundredth Street, LLC) do not intend to actively participate in discovery, but have agreed to abide by all orders of the Court regarding discovery.

Thank you for your consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/ Melissa A. Childs  
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Application GRANTED.

Dated: July 12, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE